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| 1 | EDMUND G. BROWN JR., Attorney General | |
| 2 | of the State of California KAREN B. CHAPPELLE | |
| 3 | Supervising Deputy Attorney General NANCY A. KAISER, State Bar No. 192083 | |
| 4 | Deputy Attorney General California Department of Justice | |
| 5 | 300 So. Spring Street, Suite 1702 Los Angeles, CA 90013 | |
| 6 | Telephone: (213) 897-5794 Facsimile: (213) 897-2804 | |
| 7 | Attorneys for Complainant | |
| 8 | | |
| 9 | BEFORE THE BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA | |
| 10 | | |
| 11 | | |
| 12 | In the Matter of the Accusation Against: | Case No. 2008-192 |
| 13 | LAURIE JO BROWN a.k.a. LAURIE JO VANDERLEEST | |
| 14 | a.k.a. LAURIE JO HALL 16647 E. Clovermead Street | ACCUSATION |
| 15 | Covina, CA 91722 | |
| 16 | Registered Nurse License No. 288239 | |
| 17 | Registered Ivalue Dicense Ivol 200257 | |
| 18 | Respondent. | |
| 19 | Complainant alleges: | |
| 20 | <u>PARTIES</u> | |
| 21 | 1. Ruth Ann Terry, M.P.H, R.N ("Complainant") brings this Accusation | |
| 22 | solely in her official capacity as the Executive Officer of the Board of Registered Nursing, | |
| 23 | Department of Consumer Affairs. | |
| 24 | 2. In or about 1978, the Board of Registered Nursing, Department of | |
| 25 | Consumer Affairs issued Registered Nurse License No. 288239 to Laurie Jo Brown | |
| 26 | a.k.a. Laurie Jo Vanderleest a.k.a. Laurie Jo Hall ("Respondent"). The Registered Nurse License | |
| 27 | was in full force and effect at all times relevant to the charges brought herein and will expire on | |
| 28 | February 8, 2008, unless renewed. | |
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JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing, ("Board"), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

STATUTORY PROVISIONS

- 4. Section 2750 of the Business and Professions Code ("Code") provides that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.
- 5. Section 2764 of the Code provides that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811, subdivision (b), of the Code, the Board may renew an expired license at any time within eight years after the expiration.
 - 6. Section 2761 of the Code states, in part:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct, which includes, but is not limited to, the following:

. . .

(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action.

COST RECOVERY

7. Section 125.3, subdivision (a), states, in part:

Except as otherwise provided by law, in any order issued in resolution of a disciplinary proceeding before any board within the department . . . the board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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CAUSE FOR DISCIPLINE

(Denial of Licensure by Arizona State Board of Nursing)

Respondent has subjected her license to disciplinary action under section 2761, subdivision (a)(4), on the grounds of unprofessional conduct, in that on or about May 19, 2006, pursuant to an Order made by the Arizona State Board of Nursing ("Arizona RN Board"), In the Matter of Application for RN Renewal of RN961488, Laurie Jo Brown; aka Laurie Jo Vander Leest, Laurie Jo Hall, Order No. 0511114, which is attached hereto as Exhibit A, the Arizona RN Board denied Respondent's application to practice as a professional nurse in the State of Arizona.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing, Department of Consumer Affairs issue a decision:

- 1. Revoking, suspending or placing on probation, Registered Nurse License
 No. 288239, issued to Respondent Laurie Jo Brown a.k.a. Laurie Jo VanDerLeest a.k.a. Laurie Jo
 Hall;
- 2. Ordering Respondent Laurie Jo Brown to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,
 - 3. Taking such other and further action as deemed necessary and proper.

Executive Officer

State of California

Complainant

Board of Registered Nursing

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21 DATED: (41860)

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